

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CUSTOM DESIGNS OF NASHVILLE, INC.,)	
and MAHAN MARK JANBAKHSH,)	
)	
Plaintiffs,)	
)	
v.)	<u>Civil Action No. 3-08-0665</u>
)	Judge Trauger
ALSA CORPORATION,)	
)	
Defendant.)	JURY DEMAND

DECLARATION OF W. EDWARD RAMAGE

Under penalty of perjury, I, W. Edward Ramage, declare as follows:

1. I am attorney of record for Defendant/Counter-Plaintiff Alsa Corporation. I am submitting this Declaration in support of the Motion to Withdraw as counsel of record in this case.

2. On December 1, 2008, I advised representatives of Alsa Corporation of the status of their account, expected expenses, and the need for my firm to receive payment to proceed with the representation.

3. On January 9, 2009, I sent an email to representatives of Alsa Corporation advising of the past-due status of their account and expected expenses to proceed with this litigation, and stating my intent to withdraw as counsel. A redacted copy of that email is attached hereto as Exhibit A.

4. On January 15, 2009, I sent a draft copy of the Motion to Withdraw and this declaration to representatives of Alsa Corporation, stating my intent to file the motion on January 19, 2009. Alsa Corporation has informed me that it understands the situation, but it cannot

afford to incur current counsel's fees as a further debt in this action. Subsequently, I received direction from Alsa Corporation to proceed with filing the motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of January, 2009, in Nashville, Tennessee.



W. Edward Ramage (TN Bar No. 16261)
Baker, Donelson, Bearman, Caldwell & Berkowitz
211 Commerce Street, Suite 1000
Nashville, Tennessee 37201
(615) 726-5771
eramage@bakerdonelson.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following counsel of record via the Electronic Case Filing system of the United States District Court for the Middle District of Tennessee to:

James R. Michels
Melissa C. Hunter
Stites & Harbison, PLLC
401 Commerce Street, Suite 800
Nashville, TN 37219

Jack A. Wheat
Stites & Harbison, PLLC
400 West Market Street, Suite 1800
Louisville, KY 40202-3352

this 20th day of January, 2009.

s/W. Edward Ramage /
W. Edward Ramage

Ramage, W. Edward

From: Ramage, W. Edward
Sent: Friday, January 09, 2009 11:27 AM
To: ike; 'warren'; albert
Cc: Ramage, W. Edward
Subject: FW: Custom Designs v. Alsa

REDACTED

In order to continue our representation, the following must occur:

1. We must receive a payment of _____ by January
2. You must commit to paying us a minimum of _____ a month by the 5th of each month through July.

I understand that you may not be able to commit to the above. If so, then we will need to withdraw from the case.

Regards,

Edward

